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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

V.

Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC

**IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION**

**THIS DOCUMENT RELATES TO:**

4:23-cv-05448.

MDL No. 3047

Case No.: 4:22-md-3047-YGR-PHK

4:23-cv-05448-YGR

**STIPULATION AND [PROPOSED]  
ORDER SETTING FORMAT FOR  
DECEMBER 20, 2024 JOINT LETTER  
BRIEF RE OUTSTANDING STATE  
AGENCY DISCOVERY DISPUTES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rule 7-12, the State Attorneys General (“State AGs”) and Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. On December 9, 2024, the Parties filed a joint letter brief (“December 9 Joint Letter Brief”) regarding outstanding disputes between Meta and the state agencies identified in footnotes 2, 3, and 4 of the December 9 Joint Letter Brief. ECF 1430.

2. The Court (Magistrate Judge Kang) heard argument on the disputes at the December 11, 2024 Discovery Management Conference and made certain rulings.

3. The Parties have continued to confer about the disputes, have resolved certain disputes, and have agreed to submit a joint letter brief on December 20, 2024 regarding any outstanding disputes they have been unable to resolve (the “December 20 Joint Letter Brief”).

4. The Parties have agreed, subject to the Court’s permission, to use the following format for the December 20 Joint Letter Brief. For each State for which outstanding disputes remain with agencies within that State, the Parties will include:

a. One joint sentence stating the number of agencies within the State for which disputes remain and the names of the agencies.

b. One joint sentence identifying, with bullet points, any attached exhibits pertinent to the disputes, with the exhibits limited to: (a) proposed search terms, (b) proposed custodians, (c) proposed targeted searches, and (d) search term hit reports, *e.g.*:

- Exhibit 1A: The agencies’ proposals for search terms, custodians, and targeted searches for each agency at issue.
- Exhibit 1B: Meta’s proposals for search terms, custodians, and targeted searches for each agency at issue.
- Exhibit 1C: The most recent hit reports the agencies have provided to Meta

c. No more than five sentences per side (with all agencies of the State at issue addressed in the 5 sentences allocated for that State) stating that side’s position on the disputes.

1       5. The Parties have agreed that any agency hit reports attached as exhibits will clearly  
2 identify:

3           a. The search terms that were run, either by (a) referencing the exhibit number  
4 containing the search terms or (b) attaching a list of the search terms as they were run;

5           b. The number of custodians searched;

6           c. The date range used;

7           d. Whether the hit counts are or are not deduplicated across the custodians searched;

8           e. The date the hit report was shared with Meta.

9       6. The Parties have agreed that any proposed targeted searches attached as exhibits will  
10 contain only a neutral description of the proposed targeted searches, analogous to a neutral list of search  
11 terms, list of custodians, or hit report, with no argument. The Parties will endeavor to make any  
12 proposed targeted searches attached as exhibits as uniform as possible in format.

13

14       **IT IS SO STIPULATED AND AGREED.**

15       / / /

1 DATED: December 19, 2024

Respectfully submitted,

2 **ROB BONTA**  
 3 Attorney General  
 4 State of California

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## **SIGNATURE CERTIFICATION**

Under Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: December 19, 2024

/s/ *Ashley M. Simonsen*

Ashley M. Simonsen

*Counsel for Meta Platforms, Inc.; Instagram, LLC;  
Meta Payments, Inc.; and Meta Platforms  
Technologies, LLC*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: December 20, 2024

